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 DATE FILED: 02/06/08

UNITED STATES DISTRICT COURT
 SOUTHERN DISTRICT OF NEW YORK

-----X
 ELLIOT L. BIER,

Plaintiff,

-against-

GRAND TOYS INTERNATIONAL
 LIMITED,

Defendant.
 -----X

Case No. 07 cv 7235 (JGK)

JOINT CASE MANAGEMENT ORDER

Pursuant to Rule 26(f) of the Federal Rules of Civil Procedure, after meeting on January 17, 2008, the parties, by their undersigned counsel, have agreed upon the following proposed Joint Case Management Plan:

1. **Preservation of Evidence.** All parties shall preserve any and all documents or other materials that are or may be relevant to any claim or defense in this matter, including without limitation all e-mails, other electronic documents and related back-up or storage systems.
2. **Initial Mandatory Disclosures.** Defendant shall provide its Rule 26(a)(1) initial mandatory disclosures by February ⁸/~~1~~, 2008.
3. **Document Demands and Interrogatories.** All parties shall serve any document demands and/or interrogatories by no later than ^{March 14}/~~February 15~~, 2008.
4. **Joinder/Amendments.** Joinder of any new parties and/or amendments of any pleadings shall be completed so that they may be responded to by ^{April 18}/~~March 14~~, 2008.
5. **Depositions.** Depositions of all parties and non-parties shall be completed by ^{June 27}/~~May 30~~, 2008. If overseas discovery is required, counsel will make a joint request for additional time accordingly.

6. Other Fact Discovery. All other fact discovery must be completed by ~~May 30, 2008~~ ^{June 27, 2008}, subject to the same qualification found in Paragraph 5.

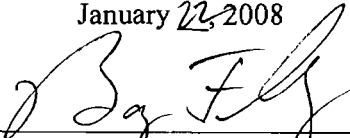
7. Expert Discovery. Expert discovery, if any, shall be completed by ~~June 30, 2008~~ ^{July 25, 2008}.

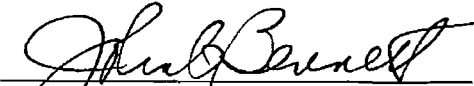
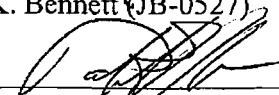
8. Dispositive Motions. Any dispositive motions shall be initiated by no later than ~~July 30, 2008~~ ^{August 29, 2008}.

9. Final Pretrial Conference. A final pre-trial conference will be held on _____, 2008.

10. Joint Pretrial Order. The parties shall submit a Joint Pretrial Order by ~~within 30 days of the Final Pretrial Order~~ ^{9/26/08}.

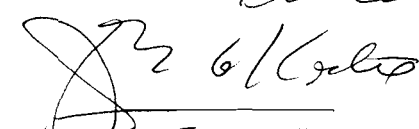
Dated: New York, New York/Roseland, New Jersey
January 22, 2008


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SO-ORDERED


U.S.D.J.

The case is referred to the Magistrate
Judge for purpose of settlement.
So ordered

2/5/08 U.S.D.J.